



August 9, 2019

VIA ELECTRONIC FILING

The Honorable Jocelyn Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29211

Re: South Carolina Energy Freedom Act (H.3659) Proceeding to Establish Each Electrical Utility's Standard Offer, Avoided Cost Methodologies, Form Contract Power Purchase Agreements, Commitment to Sell Forms, and Any Other Terms or Conditions Necessary (Includes Small Power Producers as Defined in 16 United States Code 796, as Amended); Docket No. 2019-184-E

Dear Ms. Boyd:

On behalf of Dominion Energy South Carolina, Inc. ("DESC") and in response to Order No. 2019-557 issued by the Public Service Commission of South Carolina ("Commission") in the above-referenced docket, DESC submits the following questions to the Commission for its consideration as it conducts interviews of potential third-party consultants and experts.

- 1. Have you represented or been retained to perform any services on behalf of any of the parties in Docket No. 2019-184-E? If so, please identify the party that retained you and explain the purpose for which you were hired.**
- 2. Have you represented or been retained to perform any services against any of the parties in Docket No. 2019-184-E? If so, please identify the party you opposed and explain the purpose for which you were hired.**
- 3. Have you previously testified in any proceeding before the Commission or any other state or federal commission? If so, please identify the proceeding, the party on whose behalf you testified, and the subject matter of your testimony.**

(Continued . . .)

- a. Mr. Chernick, it is our understanding that you testified against Dominion Energy South Carolina, Inc. f/k/a South Carolina Electric & Gas Company in Docket No. 1991-606-E. Is our understanding correct?
 - b. Dr. Letendre, it is our understanding that the Southern Environmental Law Center ("SELC") and the South Carolina Coastal Conservation League ("SCCCL") retained Synapse Energy Economics, Inc. in 2009 to testify against Dominion Energy South Carolina, Inc. f/k/a South Carolina Electric & Gas Company in Docket No. 2009-261-E; in 2014 to testify in the Net Energy Metering generic docket and in 2016, 2017, 2018, and 2019 to testify against Dominion Energy South Carolina, Inc. f/k/a South Carolina Electric & Gas Company in its annual fuel proceedings specifically on the subject of avoided cost calculations offered to qualifying facilities under PURPA and their application of the NEM Methodology for valuing the costs and benefits of Distributed Energy Resources. Is our understanding correct? Please explain Synapse's relationship with the SELC and SCCCL and whether it is on-going today.
4. For the work that you perform today, what percentage of your work is done on behalf of utilities? On behalf of consumer advocates? On behalf of solar developers and environmentalists? On behalf of other industry?
 5. Do you have any experience in evaluating avoided cost methodologies and calculating avoided cost rates? If so, please explain.

Thank you for allowing the parties to submit proposed questions and your consideration of this matter. If you have any questions or need additional information, please do not hesitate to contact us.

Very truly yours,



K. Chad Burgess

KCB/kms

cc: J. Blanding Holman IV, Esquire

Jeffrey M. Nelson, Esquire

Nanette S. Edwards, Esquire

Stinson Woodward Ferguson, Esquire

(all via electronic mail only)

James Goldin, Esquire

Jenny R. Pittman, Esquire

Richard L. Whitt, Esquire

Weston Adams III, Esquire